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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE
 MEMORIAL HOSPITAL, INC. (doing
 business as “Sage Memorial Hospital”); an
 Arizona non-profit corporation,

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,
 LLC; a Nevada limited liability company
 (doing business as “Razaghi Healthcare”), et
 al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO EXTEND
 TIME FOR DEFENDANTS TO
 RESPOND TO PLAINTIFF’S MOTION
 TO COMPEL [ECF # 98]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED that Defendants shall have a short three-
 day extension of time, up to and including **October 16, 2020**, to answer or respond to Plaintiff’s
 Motion to Compel Razaghi Healthcare to Produce Documents (ECF No. 98). The parties have so
 stipulated due to defense counsel’s current case load, which includes but is not limited to, extensive

pleading and discovery practice, including attempts to confer regarding third-party requests for information, in the instant case as well as complex and demanding discovery in unrelated matters. The additional time requested herein will permit counsel for Defendants to meet other case commitments while addressing Plaintiff's Motion to Compel (ECF No. 98). This is the first request to extend this deadline.

RESPECTFULLY SUBMITTED this 12th day of October 2020.

FISHER & PHILLIPS LLP

PAUL PADDA LAW, PLLC

By /s/ Kris Leonhardt
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By /s/ Paul S. Padda (with permission)
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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

Dated: October 13, 2020

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